

TSA-2002-11604 which intends to apply enhanced security measures to Part 135 operators having planes with a gross weight 12,500 pounds or heavier does not take into account the realities of General Aviation Charter Services.

Unlike Commercial Aviation Services, Charter Part 135 operators 'rarely' fly people or goods they don't already know personally. Charter operators have much greater control over their services and may discriminate at will, and usually do, as to whom they fly and to where.

The TSA is looking to the wrong place for enhanced security. There have been no credible episodes of terrorist activity involving Charter operators. In addition, Charter operators can react more quickly to suspicious person who may want to charter a flight.

Our Citation 500 has a gross weight of exactly 12,500 pounds. Our 1972 plane is lumped into a broad category of modern aircraft and shouldn't be. Many of these older plans have NO WAY of securing cockpits and it would be ludicrous to do so. There is simply no mechanical manner in which this can be accomplished

Finally, just HOW and WHERE are we going to get pilots fingerprinted, photographed, criminal background checked? Who is going to pay for this? What is the benefit.

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